

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

MOTORS LIQUIDATION COMPANY,  
*et al.*,  
f/k/a General Motors Corp., *et al.*,  
  
Debtor.

Chapter 11

Case No. 09- 50026 (REG)

Hearing Date: TBD  
Objection Deadline: TBD

**SECOND INTERIM QUARTERLY APPLICATION OF LEGAL ANALYSIS  
SYSTEMS, INC. FOR INTERIM COMPENSATION AND REIMBURSEMENT OF  
EXPENSES WITH RESPECT TO SERVICES RENDERED AS CONSULTANT ON THE  
VALUATION OF ASBESTOS LIABILITIES TO THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS HOLDINGS ASBESTOS-RELATED CLAIMS FOR THE  
PERIOD JUNE 1, 2010 THROUGH SEPTEMBER 30, 2010**

Name of Applicant:

LEGAL ANALYSIS SYSTEMS, INC.

Authorized to Provide Professional Services to:

The Official Committee of  
Unsecured Creditors Holding  
Asbestos-Related Claims of Motors  
Liquidation Company, *et al.*

Date of Retention:

April 6, 2010 *nunc pro tunc*  
to March 15, 2010

Period for which  
Compensation and  
Reimbursement are sought:

June 1, 2010 through  
September 30, 2010

Amount of Compensation  
sought as actual, reasonable  
And necessary

\$166,956.50

Amount of Expense  
Reimbursement sought as  
actual, reasonable  
and necessary

\$2,510.26

This is an:

  x   interim quarterly

       final application.

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Pursuant to 11 U.S.C. §§ 330 and 331, Rule 2016 of the Federal Rules of Bankruptcy Procedure, and the Administrative Order, Pursuant to Sections 105(a) and 331 of the Bankruptcy Code, Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals (the “Administrative Order”), the consulting firm of LEGAL ANALYSIS SYSTEMS, INC. (“Legal Analysis Systems”) hereby submits this second interim application (“Second Interim Application”) for an Order awarding it interim compensation for professional consulting services rendered as consultant on the valuation of asbestos liabilities to the Official Committee of Unsecured Creditors Holding Asbestos-Related Claims (the “Asbestos Claimants Committee”) of the debtor, Motors Liquidation Company, *et. al.*, (“Debtor”), in an amount of \$ 166,956.50, together with reimbursement of Legal Analysis System’s actual and necessary expenses incurred in the amount of \$ 2,510.26, for the period commencing June 1, 2010 through

September 30, 2010 (the "**Application Period**"). In support of this Second Interim Application, Legal Analysis Systems, Inc., respectfully represents as follows:

### **I. JURISDICTION**

1. This Court has subject matter jurisdiction pursuant to 11 U.S.C. §331.

### **II. BACKGROUND**

2. On June 1, 2010 (the "**Petition Date**"), the Debtor filed a voluntary petition for relief under Chapter 11 under Title 11 of the United States Code (the "**Bankruptcy Code**").

3. From the Petition Date through the date of this Second Interim Application, the Debtor has continued to operate its businesses and manage its properties as debtor-in-possession, pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

4. On March 2, 2010, the Office of the United States Trustee appointed the Asbestos Claimants Committee pursuant to section 1102 of the Bankruptcy Code. The Asbestos Claimants Committee is comprised entirely of persons who hold pending claims against the Debtor for asbestos-related personal injury or wrongful death.

5. On March 18, 2010, the Asbestos Claimants Committee filed and served its Application For Entry Of An Order Nunc Pro Tunc To March 15, 2010 authorizing the employment of Legal Analysis Systems as consultant on the valuation of asbestos liabilities to the Official Committee Of Unsecured Creditors Holding Asbestos-Related Claims. On April 6, 2010, the Court entered an order, approving the retention application.

### **III. RELIEF REQUESTED**

6. By this Second Interim Application, Legal Analysis Systems seek allowance and payment of \$ 166,956.50 in fees for services rendered during the Application Period and reimbursement of \$ 2,510.26 for reasonable and necessary expenses incurred during the

Application Period. Thus, Legal Analysis Systems seeks allowance and payment in the total amount of \$ 169,466.76.

7. Legal Analysis Systems has received \$19,594.00 in fees for services rendered and no promises for payment from any source for services rendered during the Application Period in connection with the case. There exists no agreement or understanding between Legal Analysis Systems and any other person for the sharing of any compensation to be received for services rendered by Legal Analysis Systems in the case.

8. All services for which compensation is requested by Legal Analysis Systems pursuant to this Application were performed for or on behalf of the Asbestos Claimants Committee in this case.

9. This is Legal Analysis System's Second Interim Application.

#### **IV. NARRATIVE DESCRIPTION OF SERVICES**

##### **Review, work on plan documents/rulings:**

(a) We reviewed rulings and pleadings on obtaining data from trusts, reviewed issues related to anonymity protocol.

##### **Confer with Committee, Professionals:**

(b) We conferred with attorneys representing the claimants' committee on the availability and quality of data sent by MLC and data privacy issues.

##### **Analyses of Claims Database:**

(c) We received, cleaned, and organized the claims data upon which our analysis relies. We gained familiarity with the problems in these data so as to adapt our analytical methods to what was available.

**Estimate Debtor's Liability:**

(d) We developed liability estimation methods tailored to the MLC data, and obtained preliminary estimates of MLC's liability.

**Research on Claims and Settlements:**

(e) We sought data from law firms on their settlements to better understand the MLC data and its sometimes anomalous values.

**Research Obtain Other Data:**

(f) We obtained data from Mealeys Litigation Reporter to understand trends in asbestos verdicts and how they might impact MLC settlement values.

**Other Experts, Evaluate, Confer:**

(h) We reviewed reports by HR&A, professionals who had earlier estimated GM's asbestos liability. We had preliminary discussions with HR&A professionals about their use of the GM data.

**Analysis of other Matters:**

(k) We designed methods for budgeting and billing that would be compatible with the activities we would be undertaking during the course of our engagement.

**V. SUMMARY OF SERVICES RENDERED**

10. The professionals at Legal Analysis Systems who have provided services to or for the Asbestos Claimants Committee in this case and their standard hourly rates during the Application Period were as follows:

<b><u>Name</u></b>	<b><u>Position</u></b>	<b><u>Years Experience</u></b>	<b><u>Rate</u></b>
Peterson	Attorney/ Social	38	\$800

<u>Name</u>	<u>Position</u>	<u>Years Experience</u>	<u>Rate</u>
	Psychologist		
Relles	Statistician	42	\$475
Ebener	Social Science Researcher	33	\$335

11. Legal Analysis Systems has maintained detailed records of the time spent in the rendition of professional services for the Asbestos Claimants Committee during the Application Period. Attached hereto as Exhibit A and incorporated herein by reference is a true and correct copy of the billing statement prepared for the services rendered in this case by Legal Analysis Systems (the "**Billing Statement**"). The Billing Statement is in the same form regularly used by Legal Analysis Systems to bill its clients for services rendered and includes the date that the services were rendered, a detailed, contemporaneous narrative description of the services, the amount of time spent for each service and the designation of the professional who performed the service. In addition, attached hereto as Exhibit B and incorporated herein by reference is a summary by category of the professional services provided during the Application Period.

12. As set forth on Exhibits A and B, Legal Analysis Systems rendered 269.60 hours of professional services during the Application Period, resulting in legal fees totaling \$ 166,956.50 and associated reasonable and necessary expenses totaling \$ 2,510.26.

13. The total value of the services rendered by Legal Analysis Systems as shown on Exhibit B, broken down among the persons rendering the services is as follows\*:

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\* Nonworking travel time is billed at one-half the professional's usual hourly rate. See Exhibit A, for breakdown.

<u>Name</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Value</u>
Peterson	126.10	\$800	\$100,880.00
Relles	128.60	\$475	\$ 61,085.00
Ebener	14.90	\$335	\$ 4,991.50
<b>Total</b>	<b>269.60</b>		<b>\$166,956.50</b>

14. Set forth below are the rates for the expenses incurred by Legal Analysis Systems for which reimbursement is requested pursuant to this Application, as well as the basis for such rates for the identified expense items:

a) The expenses during this Application Period were for Verdict Report Coding charges.

15. Attached hereto as Exhibit C and incorporated herein by reference is a summary by category of the expenses incurred by Legal Analysis Systems for which reimbursement is requested. Furthermore, incorporated herein are copies of all the receipts for the Application Period of our expenses incurred by Legal Analysis Systems for which reimbursement is requested. This information also appears on Exhibit A hereto. Further supporting documentation is available upon request.

16. Legal Analysis Systems provides expert services regarding investigation, analysis and valuation of personal injury claims in bankruptcy and litigation related matters. The services that Legal Analysis Systems has performed and will continue to perform for the Asbestos Claimants Committee include, but are not limited to, the following:

a) Review analysis, development and/ or oversight of proposed Disclosure Statement., Plan, and other similar documents in this reorganization proceeding; review relevant submissions to and rulings by the Court;

b) Meetings, conferences, telephone, email with committee members, counsel or other professionals;

c) Review and analysis of the Debtor's asbestos claims database and review and analysis of the Debtor's resolution of various Asbestos Claims, review and analysis of other relevant data;

d) Estimation of the Debtor's liability for Asbestos Claims that are pending at the present time as well as those that will be filed in the future;

e) Review documents and conduct other research on claims filings or settlements, issue of asbestos exposures, presence of asbestos containing materials and other facts that explain or contribute to understanding claims data and results of analysis of that data;

f) Identify, develop or obtain other relevant data;

g) Develop, review and quantitative analyses of claims resolution procedures including estimation of payments that would be made to various types of claims under those alternatives and development of cash flow analyses of an asbestos compensation trust under alternative procedures;

h) Evaluation of reports and opinions of experts and consultants retained by other parties to these bankruptcy proceedings;

i) Meet with other parties and other parties' experts or professionals;

j) Evaluations and analyses of proposed proofs of claims and bar dates and analyses of data from proofs of claim for asbestos claims;



k) Quantitative analyses of other matters related to the Asbestos Claims as may be requested by the ACC;

l) Testimony on such matters as is required by the ACC and preparation;

m) Prepare reports on analyses, liability forecasts, trust procedures or other matters requested by counsel;

n) Non-working travel (billed at half rate);

o) Prepare fee applications.

17. The generality of the foregoing description is amplified on a day-to-day basis by the Billing Statement attached as Exhibit A.

18. Thus, through this Second Interim Application, Legal Analysis Systems seeks interim allowance and payment of \$166,956.50 in fees and \$ 2,510.26 in expenses. A Notice of Second Interim Application will be filed and served on all parties requesting notice under Bankruptcy Rule 2002.

19. A cumulative summary of Legal Analysis Systems for services rendered and reimbursement of expenses as consultant on the valuation of asbestos liabilities for the Asbestos Claimants Committee is attached as Exhibit D for the period June 1, 2010 through September 30, 2010.

**V. ALLOWANCE OF COMPENSATION**

20. Legal Analysis Systems has endeavored to represent the Asbestos Claimants Committee in the most expeditious and economical manner possible.

**WHEREFORE**, Legal Analysis Systems, respectfully requests that the Court enter an Order approving this Application and directing payment of \$ 166,956.50 in fees and reimbursement of \$ 2,510.26 in expenses, and for such other and further relief as the Court deems just and proper.

LEGAL ANALYSIS SYSTEMS, INC.

Mark A. Peterson (J.P.)

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*Valuation Consultant to the Official Committee  
Of Unsecured Creditors Holding Asbestos-  
Related Claims of Motors Liquidation Company*

Dated: November 15, 2010

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

MOTORS LIQUIDATION COMPANY,  
*et al.*,  
f/k/a General Motors Corp., *et al.*,

Debtor.

Chapter 11

Case No. 09- 50026 (REG)

**ORDER AWARDING COMPENSATION  
AND REIMBURSEMENT OF EXPENSES**

The Court considered the Second Interim Quarterly Application of LEGAL ANALYSIS SYSTEMS, INC. ("Legal Analysis Systems"), For Interim Compensation And Reimbursement Of Expenses As Consultant On The Valuation Of Asbestos Liabilities To The Official Committee of Unsecured Creditors Holding Asbestos-Related Claims of Motors Liquidation Company (the "Application"), which Application requests allowance and payment of compensation and reimbursement of expenses in accordance with §330 and §331 of the Bankruptcy Code, and it appearing that notice of the Application was duly given in accordance with the provisions of the Bankruptcy Rules, and no further notice being necessary, and upon the record being made before this Court, and after due deliberation, and sufficient cause appearing therefore, it is hereby;

ORDERED that the Application is granted;

FURTHER ORDERED that the Debtor is directed to pay immediately any remaining unpaid fees and expenses requested in the Application.

Dated: \_\_\_\_\_, 2010

\_\_\_\_\_  
Honorable Robert E. Gerber  
United States Bankruptcy Court Judge